

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Edward G. Patrone,

Debtor.

Case No. 24-14306-PMM
Chapter 13

Motion to Extend the Automatic Stay

Debtor Edward G. Patrone, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on December 2, 2024. They have not yet filed a plan and all schedules, statements, and other documents required by by § 11 U.S.C.521(a)(1) and Fed. R. Bankr. P. 1007(b) but will do so in a timely fashion.
2. The Debtor was involved in one active bankruptcy between December 3, 2023, and December 2, 2024:

Case No.	District	Filed	Dismissed	Reason
24-11516	PAEB	05/03/2024	10/10/2024	Unreasonable Delay; Failure to Make Plan Payments

3. Because the Debtor was involved in only one active bankruptcy between November 19, 2023, and November 18, 2024, the automatic stay is set to expire on January 1, 2025. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

5. This case was filed in good faith. The debtor's daughter now lives with the debtor, and will be contributing to the monthly plan payments.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: December 2, 2024

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